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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

CALISTA ENTERPRISES LTD, a

Republic of Seychelles Company,

Plaintiff,

vs.

TENZA TRADING LTD., a Cyprus

Company,

Defendant.

Case No. 3:13-cv-01045-SI

DEFENDANT AND
COUNTERCLAIMANT TENZA
TRADING LTD.'S MOTION TO
COMPEL DISCOVERY

Expedited Hearing Requested

Pursuant to Federal Rules of Civil Procedure 34 and 37(a), Defendant Tenza Trading Ltd.

("Tenza"), submits the following motion:

LR 7-1 CERTIFICATION

The undersigned counsel for Tenza certifies that counsel for Tenza conferred in good faith with counsel for Plaintiff Calista Enterprises Ltd. ("Calista") by telephone on 2/20/2014 and 2/24/14 prior to filing this motion. The parties were unable to resolve the issues raised in this motion, and the Court's assistance is respectfully requested.

MOTION

Pursuant to Rules 34 and 37(a) of the Federal Rules of Civil Procedure, Tenza, by its undersigned attorneys, hereby respectfully moves the Court for an order compelling Calista to respond fully to Tenza's Request for Production of Documents Nos. 3, 9, and 13 within fourteen (14) days of the Court's order, as provided by LR 37-2. This motion is supported by the concurrently filed Memorandum in Support, the Declaration of Paul N. Tauger, and the exhibits submitted in support of the declaration.

DATED this 27th day of February, 2014.

s/ Devon Zastrow Newman

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